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Attorneys for David Seror, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**SAN FERNANDO VALLEY DISTRICT**

In re

ALLIANCE FUNDING GROUP, INC.,

Debtor.

Case No. 1:17-bk-11888-MT

Chapter 7

Adv. No. 1:18-ap-01076-MT

**JOINT STATUS REPORT**

DAVID SEROR, solely in his capacity as the  
CHAPTER 7 TRUSTEE, for the bankruptcy  
estate of debtor, Alliance Funding Group, Inc.,

Plaintiff,

v.

RAZMIK ASLANJAN a/k/a Razmik Aslanyin,  
an individual; *et al.*,

Defendants.

**Status Conference:**

Date: November 13, 2019

Time: 10:00 a.m.

Place: Courtroom 302

United States Bankruptcy Court

21041 Burbank Blvd.

Woodland Hills, CA 91367

**TO THE HONORABLE MAUREEN A. TIGHE, UNITED STATES CHIEF BANKRUPTCY  
JUDGE AND PARTIES-IN-INTEREST:**

1. The remaining parties litigant to this adversary proceeding are David Seror, Chapter 7 Trustee ("Trustee") for the bankruptcy estate Alliance Funding Group, Inc. ("Debtor"), and Alexander Usmanov and Natalia Usmanova (collectively referred to as "Defendants") (Trustee and Defendants herein collectively the "Parties"). Pursuant to Order entered 10/24/19 [Doc. 105], setting

1 a status conference for November 13, 2019, at 10:00 a.m., the Parties submit the following Joint  
2 Status Conference Report:

3 2. The matter in controversy is whether any liens assertedly held by the Defendants and  
4 secured by property formally that of the Debtor located at 1020 E. Providencia Avenue, Burbank,  
5 CA 91501, APN# 5620-003-029, County of Los Angeles, State of California ("Providencia") have  
6 now, upon the Court's approval of the Trustee's sale of Providencia, attached to the net proceeds of  
7 that sale.

8 3. Counsel have undertaken written discovery. The parties believe that additional  
9 depositions and document productions are necessary prior to a pre-trial conference, all pertaining to  
10 the lien issues described hereinabove.

11 4. The Trustee has taken the depositions of each of the Defendants. The Trustee is trying  
12 to serve a deposition subpoena on Dr. Ruvin Feygenberg for a deposition he hopes to occur on  
13 November 21, 2019. A prior effort to serve a subpoena for an earlier date was unsuccessful.

14 5. The Defendants served discovery subpoenas on the Debtor and Mr. Firooz Payan,  
15 requiring documents production by October 18, 2019 and scheduling depositions on October 25,  
16 2019; no documents were produced by October 18, 2019 and there were no appearances on October  
17 25, 2019. The Defendants plan to meet and confer with the subpoenaed parties, and if necessary, file  
18 motions to compel compliance with both the production and deposition subpoenas served.  
19 Depending on the outcome of the efforts referred to in paragraph 4 and 5 herein, further motions or  
20 discovery may be necessary.

21 6. To allow time to complete the aforescribed work, the Parties expect to complete non-  
22 expert discovery efforts in April of 2020 and request a pre-trial conference to be scheduled  
23 thereafter. The Trustee estimates his side of the case will take 1-2 days at trial. It is unknown at  
24 this time how many witnesses he will call and how many exhibits he will use at trial. Defendants  
25 estimate their side of the case will take 1-2 to present. It is unknown at this time how many witnesses  
26 Defendants will call and how many exhibits they will use at trial.

27 7. The Parties have discussed settlement, but no settlement has been reached. The Parties  
28 have not attended mediation and suggest the Court establish a last date for completion of one day of

1 mediation by the end of April 2020. The parties look forward to establishing an appropriate  
2 scheduling at the within Status Conference.

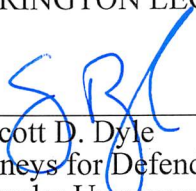
3  
4  
5 DATED: October 30, 2019

BRUTZKUS GUBNER

6  
7 By: /s/ Richard D. Burstein  
Richard D. Burstein  
Attorneys for David Seror, Chapter 7 Trustee

8  
9 DATED: October 30, 2019

BARRINGTON LEGAL, INC.

10 By:   
11 Scott D. Dyle  
Attorneys for Defendants  
12 Alexander Usmanov and Natalia Usmanova  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: **21650 Oxnard Street, Suite 500, Woodland Hills, CA 91367.**

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 30, 2019**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Raffy M Boulgourjian rboulgourjian@gmail.com
- Reagan E Boyce rboyce@cr.law
- Richard Burstein rburstein@bg.law, ecf@bg.law
- Eamon Jafari jafari@barringtonlegal.com, gould@barringtonlegal.com
- David Seror (TR) aquijsano@bg.law, C133@ecfcbis.com
- United States Trustee (SV) ustpreion16.wh.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **October 30, 2019**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Maureen Tighe  
U.S. Bankruptcy Court  
21041 Burbank Blvd., #324  
Woodland Hills, CA 91367-6603

Counsel for Defendants Usmanovs  
Scott D. Dyle  
Barrington Legal, Inc.  
11601 Wilshire Boulevard, 5th Floor  
Los Angeles, CA 90025

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 30, 2019  
Date

JESSICA STUDLEY  
Printed Name

/s/ Jessica Studley  
Signature